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(804) 445-1814

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Waste Management Division
U.S. Environmental Protection Agency
Attn: Mr. Carl Froede
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: MCB Camp Lejeune Draft Final Site Management Plan

Dear Mr. Froede:

In reference to your letter of August 23, 1991 (received in our office September 4, 1991), the Atlantic Division, Naval Facilities Engineering Command (LANTNAVFACENGCOM) and Marine Corps Base, Camp Lejeune (MCB Camp Lejeune) have reviewed the Environmental Protection Agency's (EPA) comments to the Draft 1992 Site Management Plan (SMP). Our response to the specific comments are provided in the enclosure.

The Draft Final SMP does not reflect categorization of sites into operable units [with the exception of the Hadnot Point Industrial Area (HPIA)]. "Operable Units" has been the subject of discussion at two recent meetings (October 15, 1991 in Raleigh, North Carolina and October 24, 1991 in Norfolk, Virginia) held with EPA, LANTNAVFACENGCOM, and MCB Camp Lejeune.

a. Prior to the October 15th meeting, our concept of an operable unit was that it was "media" specific, e.g. a contaminated shallow aquifer, grossly contaminated soils, buried drums, etc. We understood that operable units were defined during the RI process, as further information (for example, the presence of buried drums resulting from a geophysical survey) became apparent. In accordance with this concept, we designated the shallow aquifer at HPIA as Operable Unit No. 1 in the Draft 1992 SMP.

b. During the October 15th meeting, we gained an expanded understanding of an operable unit as a result of your brief presentation of an operable unit. Our present concept of an operable unit is that it can be "area" specific or "site" specific in addition to being "media" specific. Based on this new understanding, we are now presenting the entire HPIA (excluding Sites 21 and 22 located within HPIA) as Operable Unit No. 1.

Re: MCB Camp Lejeune Draft Final Site Management Plan

c. It was our understanding at the October 15 meeting that the Draft Final SMP, due to EPA within two weeks of that meeting, would not be expected to reflect categorization of all sites into operable units due to the unavailable time to do so. We see two available options for presenting sites categorized into operable units. Either we could present the categorization in the June 1992 Draft SMP or we could present this sooner (second quarter FY-92). We prefer to present this in the June 1992 Draft SMP but will do so in the second quarter FY-92 if EPA desires.

d. In either case, we have specific questions concerning appropriate methods of categorizing sites into operable units. We would like to meet with EPA to discuss these questions and informally present our initial ideas for forming operable units at MCB Camp Lejeune. We suggest this meeting be held at the EPA Region IV office in Atlanta on December 13, 1991. This will allow time for you to review the Draft Final SMP.

3. At the December meeting, we will provide you draft accelerated schedules for two other key sites, Lot 203 of Site #6 and Mercury Dump Site #48. These, along with the accelerated schedule of the HPIA shallow aquifer interim remedial action as shown in the SMP, are initial candidate sites for proposed accelerated schedules.

4. Our point of contact for questions concerning this matter is Ms. Laurie Boucher, P.E., at (804) 445-1814.

Sincerely,

P. A. RAKOWSKI, P.E.
Head
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Enclosure

Copy to:
N.C. DEHNR
MCB Camp Lejeune (AC/S, Environmental Management)
Blind copy to:
1822 (LAB)
1822 Admin. Record File
09A21/09C
18S/LANTDIV Reading File
LABDOC:EPASMP92

LANTNAVFACENCOM/MCB CAMP LEJEUNE RESPONSE
TO EPA REGION IV COMMENTS ON THE 1992 DRAFT SMP

Under GENERAL COMMENTS:

- 1) We agree with EPA. All references to updating the SMP will be changed to reflect June 1 versus November 15.
- 2) The SMP has been revised to reflect a five year overview of remedial activities at MCB Camp Lejeune.
- 3) In addition to providing a general description of each removal action in Section 7.0 of the SMP, all removal and/or interim remedial actions which will be initiated prior to June 1, 1992 are shown within that sites section of the SMP. For removal actions, the predicted date is presented in "fiscal year quarter."

Under SPECIFIC COMMENTS:

- 1) A clearer display of each unit (e.g. shallow aquifer, deep aquifer, shallow soils) within the HPIA Operable Unit No. 1 is presented in the Draft Final SMP. Compliance dates for primary and secondary documents is presented. The dates for submittals of the "Draft ROD" and "Final RI/FS Report and PRAP" have been reversed.
- 2) The SMP has been revised to list the date for RI/FS Workplan submittal under the "Compliance Date" column. This date was incorrectly listed under the "Target Date" column in previous versions of the SMP.

MCB Camp Lejeune intends to conduct a removal of the palletized "DDT Drums" at Site 6 no later than the second quarter of FY-92. The appropriateness of an interim remedial action at Site 6 will be evaluated and presented to EPA and N.C. DEHNR once Phase I (geophysics and soil sampling) have been conducted at Site 6. If operable units such as buried DDT drums, areas of gross soil contamination, and/or gross soil contamination in the Site 6 ditch are apparent as a result of Phase I investigations, we agree that an interim remedial action would be an appropriate method of proceeding to expedite removal and/or remediation. We contend that the most timely method of making this happen is by moving forward with the RI/FS Phase I at this site (for which a Workplan is currently in development and due to EPA by December 1, 1991).

- 3) Same response as No. 2.

**LANTNAVFACENGCOM/MCB CAMP LEJEUNE RESPONSE
TO EPA REGION IV COMMENTS ON THE 1992 DRAFT SMP**

- 4) Same response as No. 2.
- 5) Same response as No. 2.
- 6) Same response as No. 2.
- 7) Same response as No. 2.
- 8) Same response as No. 2.